

**LITE DEPALMA GREENBERG, LLC**

Allyn Z. Lite  
Joseph J. DePalma  
Katrina Carroll  
Mayra V. Tarantino  
Two Gateway Center, Suite 1201  
Newark, NJ 07102-5003  
Telephone: (973) 623-3000  
Facsimile: (973) 623-0858  
[alite@litedepalma.com](mailto:alite@litedepalma.com)  
[jdepalma@litedepalma.com](mailto:jdepalma@litedepalma.com)  
[kcarroll@litedepalma.com](mailto:kcarroll@litedepalma.com)  
[mtarantino@litedepalma.com](mailto:mtarantino@litedepalma.com)

*Liaison Counsel for Lead Plaintiff*  
[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

_____	)	
KAREN M. BAUER, Individually and on	)	Civil Action No. 09-1120-JLL-MAH
Behalf of All Others Similarly Situated,	)	
	)	
Plaintiff,	)	
vs.	)	
	)	
PRUDENTIAL FINANCIAL, INC., et al.	)	
	)	
Defendants.	)	
_____	)	

**NOTICE OF MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT**

**PLEASE TAKE NOTICE** that on November 14, 2011 at 10:30 a.m., pursuant to the Court's August 5, 2011 Order [Dkt. No. 116] and Rule 23 of the Federal Rules of Civil Procedure, counsel for Lead Plaintiff Paul J. Perry, Trustee of the Paul J. Perry Revocable Trust ("Plaintiff"), will move before the Honorable Jose L. Linares, U.S.D.J. at the United States District Court, 50 Walnut Street, Newark, New Jersey 07102, for Final Approval of the proposed

\$16,500,000 settlement (the “Settlement”) of this class action litigation (the “Motion”), including the certification of a settlement class on behalf of all purchasers of the 9% Junior Subordinated Notes of Prudential Financial, Inc. from June 24, 2008 through March 12, 2009, inclusive, pursuant to and/or traceable to a Registration Statement and Prospectus issued in connection with Prudential’s June 24, 2008 Initial Public Offering (the “Settlement Class”).

In support of the Motion, Plaintiff has submitted (i) the Declaration Of Jeffrey S. Nobel, (ii) the Memorandum In Support Of Motion For Final Approval Of Class Action Settlement, Motion for an Award of Attorneys’ Fees and Reimbursement of Expenses, and Motion for Award to Lead Plaintiff, and (iii) a [Proposed] Final Judgment and Order of Dismissal, With Prejudice (attached hereto as Exhibit A).

Dated: October 21, 2011

**LITE DEPALMA GREENBERG, LLC**

By: /s/ Joseph J. DePalma  
Allyn Z. Lite  
Joseph J. DePalma  
Katrina Carroll  
Mayra V. Tarantino  
Two Gateway Center, Suite 1201  
Newark, NJ 07102-5003  
Telephone: (973) 623-3000  
Facsimile: (973) 623-0858  
[alite@litedepalma.com](mailto:alite@litedepalma.com)  
[jdepalma@litedepalma.com](mailto:jdepalma@litedepalma.com)  
[kcarroll@litedepalma.com](mailto:kcarroll@litedepalma.com)  
[mtarantino@litedepalma.com](mailto:mtarantino@litedepalma.com)

*Liaison Counsel for Lead Plaintiff*

**IZARD NOBEL LLP**

Robert A. Iazard  
Jeffrey S. Nobel  
Mark P. Kindall  
Seth R. Klein  
Nancy A. Kulesa  
29 South Main Street, Suite 215

West Hartford, CT 06107  
Telephone: (860) 493-6292  
Facsimile: (860) 493-6290  
jnobel@izardnobel.com

*Lead Counsel for Lead Plaintiff*